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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	CR 16-0437 JST
)	
14 Plaintiff,)	STIPULATION AND PROPOSED ORDER FOR
)	A CONTINUANCE AND EXCLUSION OF TIME
15 v.)	UNDER THE SPEEDY TRIAL ACT, 18 U.S.C.
)	§ 3161 ET. SEQ
16 RICARDO MANUEL DURAN,)	
)	
17 Defendant.)	
)	

18
19 The United States of America, by and through its attorney of record, and defendant Ricardo
20 Manuel Duran ("defendant"), by and through his attorney of record, hereby stipulate as follows:

21 1. For the reasons stated in open court on May 5, 2017, the Court continued the above-
22 captioned matter to May 26, 2017 at 9:30 a.m. and excluded time under the Speedy Trial Act from May
23 5, 2017 through May 26, 2017 on the basis of effective preparation of counsel under 18 U.S.C.
24 §§3161(h)(7)(A) and (B)(iv).

25 2. The parties stipulate and agree that this matter should be continued to May 26, 2017 at
26 9:30 a.m., and that the failure to grant such a continuance would unreasonably deny the defendant the
27 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
28 The parties further stipulate and agree that the time from May 5, 2017 through May 26, 2017

1 should be excluded on the basis that the ends of justice are served by taking such action which outweigh
2 the best interest of the public and the defendant in a speedy trial and for effective preparation of counsel,
3 taking into account the exercise of due diligence, under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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5 DATED: May 12, 2017

Respectfully submitted,

6 BRIAN J. STRETCH
United States Attorney

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8 /s/
DEBORAH R. DOUGLAS
Assistant United States Attorney

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10 /s/
ANGELA HANSEN, Esq.
Attorney for Defendant

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13 ORDER

14 Upon the parties' stipulation, and GOOD CAUSE appearing, IT IS HEREBY ORDERED that
15 the above-captioned matter shall be continued to May 26, 2017 at 9:30 a.m. for a change of plea and that
16 the time from May 5, 2017 through May 26, 2017 shall be excluded in accordance with the provisions of
17 the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). The Court finds that failure to grant the
18 continuance would unreasonably deny the defendant and the government the reasonable time necessary
19 for effective preparation, taking into account the exercise of due diligence, and the ends of justice served
20 by the continuance outweigh the best interests of the public and the defendant in a speedy trial.

21 **IT IS SO ORDERED.**

22 DATED: May 17, 2017

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HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE